

**IN THE DISTRICT COURT OF THE VIRGIN ISLANDS
DIVISION OF ST. CROIX**

UNITED STATES OF AMERICA,

v.

NICOLE MORALES,

Defendant.

CRIMINAL NO. 2023-20

INFORMATION

VIOLATIONS:

Wire Fraud
18 U.S.C. § 1343

The United States Attorney charges that:

INTRODUCTION

At all times relevant to this Indictment:

1. On November 10, 2015, **NICOLE MORALES** began working as the Office Manager at Nichols, Newman, Logan, Grey, and Lockwood, P.C. (the "Victim").
2. **NICOLE MORALES'** contract stipulated that she would receive a salary of \$58,000 per year effective November 10, 2015, and would increase to \$65,000 per year, effective January 15, 2016, provided she demonstrated competence and diligence in performance of her duties.
3. One of **NICOLE MORALE'S** duties included processing payroll for all the Victim's employees, including herself. Payroll was processed on a weekly basis. The Victim used QuickBooks for accounting and processing payroll.
4. QuickBooks is an accounting software produced by Intuit Inc. which is headquartered in Mountain View, California. The Victim linked their Banco Popular bank account to QuickBooks for the purposes of processing and paying payroll. Banco Popular is headquartered in San Juan, Puerto Rico. **NICOLE MORALES**, using QuickBooks,

inputted payroll information for the Victim's employees and falsely inflated the amount she was to be paid. She would then initiate the wire-transfer payments for the employees and herself. After the money was wired, she would go back into QuickBooks and change the amount she was paid back to what she was supposed to receive. **NICOLE MORALES** then generated a report in QuickBooks with this amount and presented it to the Victim for approval.

5. Specifically, starting on December 31, 2015, **NICOLE MORALES** began a pattern of inflating her pay when processing payroll for the Victim. **NICOLE MORALES** continued this pattern until approximately January 11, 2019. **NICOLE MORALES**, using direct deposit via QuickBooks, wired unauthorized funds from the Victim's Banco Popular bank account into three separate personal bank accounts: a Bank of St. Croix account, headquartered in St. Croix, Virgin Islands; a Banco Popular account, headquartered San Juan, Puerto Rico; and a Citibank account, headquartered in New York, New York.
6. As a result of the foregoing criminal conduct, **NICOLE MORALES** stole approximately \$371,595.74 from the Victim.

COUNTS ONE THROUGH ONE HUNDRED FIFTY-THREE

Wire Fraud
(18 U.S.C § 1343)

The Introduction is hereby incorporated by reference, as though fully set forth herein.

From on or about December 31, 2015, to on or about January 11, 2019, on St. Croix, in the District of the Virgin Islands, the defendant,

NICOLE MORALES,

did knowingly devise and intend to devise a scheme and artifice to defraud and to obtain money

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and property by means of false and fraudulent pretenses, representations and promises and caused to be transmitted by means of wire communications in interstate commerce, a series of electronic transfer of funds, from Nichols, Newman, Logan, Grey, and Lockwood, P.C.'s linked Banco Popular banking account, via QuickBooks, to the defendant's checking accounts at the Bank of St. Croix, Banco Popular, and Citibank, each transmission constituting a separate count as specified below:

Count	Date	Deposit Amount	From	To	Via
1	12/31/15	\$1,385.25	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
2	01/15/16	\$1,847.00	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
3	03/11/16	\$960.92	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
4	03/11/16	\$239.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
5	03/18/16	\$554.10	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
6	03/25/16	\$1,569.95	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
7	04/01/16	\$1,052.00	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
8	04/08/16	\$336.75	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
9	04/15/16	\$404.10	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
10	04/22/16	\$1,052.60	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
11	04/29/16	\$67.35	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
12	05/06/16	\$67.35	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
13	05/13/16	\$396.45	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
14	05/20/16	\$396.45	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
15	05/27/16	\$1,402.60	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
16	06/03/16	\$67.35	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
17	06/10/16	\$1,879.93	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
18	06/17/16	\$720.20	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
19	06/24/16	\$2,372.27	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
20	07/01/16	\$1,448.78	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
21	07/08/16	\$1,802.87	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
22	07/15/16	\$1,202.60	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
23	07/22/16	\$1,052.60	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
24	07/29/16	\$505.63	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
25	08/26/16	\$1,995.42	Banco Popular in San Juan, Puerto Rico	Bank of St. Croix Christiansted, St. Croix USVI	Intuit Inc. in Mountain View, CA
26	08/26/16	\$28.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
27	09/02/16	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
28	09/09/16	\$827.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
29	09/16/16	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
30	09/23/16	\$1,116.95	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
31	09/30/16	\$827.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
32	10/07/16	\$827.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
33	10/14/16	\$1,717.71	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
34	11/10/16	\$1,601.43	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
35	11/18/16	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
36	11/25/16	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
37	12/02/16	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
38	12/09/16	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
39	12/16/16	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
40	01/06/17	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
41	01/13/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
42	01/20/17	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
43	01/27/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
44	02/03/17	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
45	02/10/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
46	02/17/17	\$2,077.88	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
47	02/24/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
48	03/03/17	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
49	03/10/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
50	03/17/17	\$1,154.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
51	03/24/17	\$1,845.55	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
52	03/24/17	\$47.62	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
53	03/31/17	\$1,986.26	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
54	03/31/17	\$622.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
55	04/07/17	\$2,031.70	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
56	04/14/17	\$1,523.78	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
57	04/21/17	\$1,800.82	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
58	04/28/17	\$2,354.93	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
59	05/05/17	\$1,154.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
60	05/12/17	\$2,000.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
61	05/19/17	\$1,950.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
62	05/26/17	\$3,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
63	06/02/17	\$2,200.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
64	06/09/17	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
65	06/16/17	\$3,600.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
66	06/23/17	\$5,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
67	06/30/17	\$5,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
68	07/07/17	\$2,700.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
69	07/14/17	\$3,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
70	07/21/17	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
71	07/28/17	\$2,950.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
72	08/04/17	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
73	08/11/17	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
74	08/18/17	\$2,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
75	08/25/17	\$2,600.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
76	09/01/17	\$3,500.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
77	09/08/17	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
78	09/15/17	\$2,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
79	10/06/17	\$1,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
80	10/13/17	\$2,489.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
81	10/13/17	\$60.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
82	10/20/17	\$2,189.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
83	10/20/17	\$60.62	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
84	10/27/17	\$2,189.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
85	10/27/17	\$60.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
86	11/03/17	\$2,639.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
87	11/03/17	\$460.62	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
88	11/10/17	\$3,158.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
89	11/10/17	\$91.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
90	11/17/17	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
91	11/24/17	\$2,430.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
92	11/24/17	\$575.00	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
93	12/01/17	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
94	12/08/17	\$1,700.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
95	12/15/17	\$1,730.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
96	12/22/17	\$3,053.83	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
97	12/29/17	\$2,050.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
98	01/05/18	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
99	01/12/18	\$2,740.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
100	01/19/18	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
101	01/26/18	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
102	02/02/18	\$2,330.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
103	02/09/18	\$3,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
104	02/16/18	\$3,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
105	02/23/18	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
106	03/02/18	\$2,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
107	03/09/18	\$3,150.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
108	03/16/18	\$2,700.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
109	03/23/18	\$2,700.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
110	03/29/18	\$2,600.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
111	04/06/18	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
112	04/13/18	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
113	04/20/18	\$3,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
114	04/27/18	\$1,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
115	05/04/18	\$2,002.38	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
116	05/04/18	\$737.62	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
117	05/11/18	\$3,512.37	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
118	05/11/18	\$737.63	Banco Popular in San Juan, Puerto Rico	Citibank New York, New York	Intuit Inc. in Mountain View, CA
119	05/18/18	\$2,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
120	05/25/18	\$2,150.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
121	06/01/18	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
122	06/08/18	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
123	06/15/18	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
124	06/22/18	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
125	06/29/18	\$5,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
126	07/06/18	\$5,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
127	07/13/18	\$4,350.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
128	07/20/18	\$2,700.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
129	07/27/18	\$4,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
130	08/03/18	\$4,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
131	08/10/18	\$4,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
132	08/17/18	\$5,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
133	08/24/18	\$5,450.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
134	08/31/18	\$5,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
135	09/07/18	\$4,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
136	09/14/18	\$3,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
137	09/21/18	\$5,750.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
138	09/28/18	\$2,300.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
139	10/05/18	\$5,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
140	10/12/18	\$4,350.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
141	10/19/18	\$6,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
142	10/26/18	\$6,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
143	11/02/18	\$4,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

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Count	Date	Deposit Amount	From	To	Via
144	11/09/18	\$6,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
145	11/16/18	\$6,250.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
146	11/23/18	\$5,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
147	11/30/18	\$5,150.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
148	12/07/18	\$6,050.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
149	12/14/18	\$5,350.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
150	12/21/18	\$5,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
151	12/28/18	\$5,350.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
152	01/04/19	\$2,550.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA
153	01/11/19	\$2,650.00	Banco Popular in San Juan, Puerto Rico	Banco Popular San Juan, Puerto Rico	Intuit Inc. in Mountain View, CA

All in violation of Title 18, United States Code, Section 1343.

FORFEITURE NOTICE

1. The Introduction and allegations contained in Counts One through One Hundred Fifty-Three of this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture pursuant to Title 18, United States Code, Sections 981(a)(1) and 28 U.S.C. § 2461(c)

2. Upon conviction of any of the offenses identified in Counts One through One Hundred Fifty-Three, the defendant,

NICOLE MORALES,

shall forfeit to the United States, pursuant to 18 U.S.C. §§ 981(a)(1) and 28 U.S.C. §2461(c), any property traceable to such property, or any property real or personal, which constitutes or is derived from proceeds traceable to a violation of 18 U.S.C. § 1343, including, but not limited to, the following:

A. A forfeiture money judgment in an amount equal to the amount of proceeds that the defendant personally obtained from the commission of Counts One through One Hundred Fifty-Three.

Substitute Assets

3. If any property described above, as a result of any act or omission of the defendant:

- A. Cannot be located upon the exercise of due diligence;
- B. Has been transferred or sold to, or deposited with, a third party;
- C. Has been placed beyond the jurisdiction of the court;
- D. Has been substantially diminished in value; or
- E. has been commingled with other property which cannot be divided without difficulty,

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the United States of America shall be entitled to forfeiture of substitute property, pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code Section 2461(c).

Dated: December 20, 2023

DELIA L. SMITH
United States Attorney

Michael J. Conley
Criminal Chief

By:


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